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Mr Timothy Rehder
Rocky Flats Team Lead
U S Environmental Protection Agency, Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202-2466

Dear Mr Gunderson and Mr Rehder

Pursuant to the *Rocky Flats Cleanup Agreement (RFCA), Attachment 5, Rocky Flats Environmental Technology Site Action Levels and Standards Framework for Surface Water, Groundwater, and Soils (ALF), Part 2 4A*, the Department of Energy (DOE), Rocky Flats Field Office (RFFO) is notifying you of water-quality monitoring results from the RFCA Point-of-Evaluation (POE) surface-water monitoring station location GS10 is located in South Walnut Creek upstream of Po B-1. The calculated 30-day moving average for americium (Am) for April 11, 2001, triggered the reporting requirements under RFCA Attachment 5, Section 2 4 (B) (for details, see Table 1). The April 9, 2001, composite sample that triggered the reportable event is representative of GS10 water quality from April 9, 2001, through April 11, 2001. The RFFO gained knowledge of this data on July 5, 2001. Preliminary verbal notification was provided to both agencies by voice mail message on the same day.

RFCA Reporting Protocol

To meet the Rocky Flats Environmental Technology Site's (Site) RFCA commitment, DOE must transmit this information to the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) within the 15-day reporting period, which ends July 20, 2001. In addition, RFCA also requires that DOE, within 30 days of gaining knowledge of the reportable results, submit to EPA and CDPHE a source evaluation plan and schedule addressing this reportable value. This plan must be transmitted by August 6, 2001. The letter serves as notification and addresses the requirement for a source evaluation plan and schedule.

Reportable Value Description

Validated analytical results for all samples that were used in the calculation are listed in Table 2. Although plutonium (Pu) 30-day average values did not exceed the reporting threshold during the period, the Pu analytical results are included in Table 2 for completeness.

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Please note that the calculated 30-day average for Am diminished to 0.15 pCi/L April 12, 2001, and remained below the reporting threshold for the rest of April and into May 2001. This newest GS10 reportable event is consistent with seasonal observations since 1997 at this location, following implementation of RFCA flow-paced monitoring.

Table 1 – Reportable 30-Day Average Value for RFCA POE Monitoring Location GS10

Analyte	Date of Reportable Value	Reportable 30-day Avg. Value (pCi/L)
Americium	4/11/01	0.19

Table 2 – Validated Analytical Results for Composite Samples Collected at GS10 used in the 30-Day Average Calculation for Americium

Composite Sample Start Date	Americium Analytical Result (pCi/L)	Plutonium Analytical Results (pCi/L)
2/28/01	0.06	0.06
3/15/01	0.06	0.05
3/27/01	0.04	0.06
4/9/01	0.37	0.20

Downstream Water Quality Monitoring

Water flowing through GS10 also passes through the lower B series ponds (Ponds B-4 and B-5) and Walnut Creek before leaving the Site. The RFCA Points-of-Compliance (POCs) GS08 (Pond B-5) and GS03 (Walnut Creek at Indiana St.) subsequently monitor this water downstream of GS10. GS10 analytical results and the reportable 30-day average values were compared with those for predischage samples collected from Pond B-5 prior to the May 2001 direct discharge, and from RFCA POC monitoring stations GS08 and GS03. Monitoring results from Pond B-5 and both POC monitoring locations were below reporting thresholds and met stream standards for the same time period.

Ongoing GS10 Source Investigation

The RFFO and its contractor are finalizing the source investigation of the GS10 sub-drainage conducted during Calendar Year 2000. This investigation is guided by the *Sampling and Analysis Plan for Automated Synoptic Surface-Water and Sediment Sampling for the GS10 Source Investigation* and is designed to identify location-specific subdrainage areas that may contain actinide source areas and further define or resolve the location of discrete "Am-enriched" source areas.

Also, CDPHE is conducting an independent investigation of the GS10 subdrainage. A report of this evaluation is still forthcoming.

The Site's plan and schedule for investigating GS10 reportable concentrations, including the one reported here, are unchanged, as noted below.

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Recommendation

The findings and conclusions of prior Walnut Creek and GS10 source evaluations suggest that one or more low-level distributed actinide source areas exist within the GS10 subdrainage. Additionally, Pu/Am activity ratios in the surface water during the reportable events suggest the existence of low-level actinide source areas that are relatively enriched in Am. These source evaluations also concluded that ongoing Site activities (i.e., Decontamination and Decommissioning and Environmental Restoration projects, excavations, or other routine operations) did not contribute to increased contamination and reportable values. Nothing in this recent data suggests that a change in these conclusions is warranted. Thus, further project review is not planned at this time due to the repetitive and predictable nature of this event.

In consideration of past source evaluation findings and conclusions, RFFO proposes the following in response to this recent reportable value at GS10:

Evaluation and interpretation of reportable values will be incorporated into the ongoing GS10 source investigation. Data evaluation and interpretation will be included in the report prepared for the synoptic and sediment sampling source investigation. This report is currently in review and will be available by the fourth quarter of Fiscal Year (FY) 2001 or first quarter of FY 2002.

If you have any questions concerning this transmittal, please contact me at (303) 966-5918 or Glenn Doyle at (303) 966-3087.

Sincerely,



Joseph A. Legare
Assistant Manager
for Environment and Infrastructure

cc

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